11/18/2018

Commenter	Comment
Don and Ken	*Add 3-6 month delay for continuous temp monitoring requirements (based on past conversations of difficulty to purchase and install equipment based on fast tracking of permit - may not be as big of an issue if permit issuance is delayed?)
Don	*Take out continuous monitoring at CNO where discharges are intermittent and continuous sampling may not be possible
Don	*Minimum run time for units for sampling (Don Redman, 10/25/18)
Don	*Little Goose sumps are drainage only (Don Redman, 10/19/18); spreadsheet updated and sent on 10/19/18
Don	*Check Don Redman email on 10/11/18 for outfall accuracy at LoMo
Don	*Check Don Redman email on 9/13/18 on outfall accuracy at Little Goose 13 and 15 and TSS monitoring
Don and Ken	*Check on existing plans that may satisfy permit BMP and EAL plan requirements; opportunity to better explain links between permit-required plans and existing plans? (based on 11/1 phone call)
Columbia River temperature TMDL	WLA of differences in temperature
Ecology - permits	Page 2; The schedule of submittals is incomplete based on the requirements of the permit. For example, it does not include the Annual Adaptive Management Report for the BMP Plan. Having all submittals listed up front will avoid confusion in this first permit cycle.
Ecology	**Effluent Limitations and Monitoring** Consider adding a requirement for photographic documentation to substantiate the observation of the receiving water in the vicinity of the effluent discharge.
Ecology	The permit contains no mechanism to verify that PCBs are not being discharged. Characterization and effectiveness monitoring needs to be a part of the permit requirements to inform BMP implementation. (see comments on BMP section).

Category	Ranking (LOE)	Approach
monitoring	low	Will add in permits and add explanation in FS
monitoring	low	Take out in permit but explain in FS
monitoring	low/med	Talk with Susan
outfalls	low	Double-check Snake River permit limits
outfalls	low	Double-check Lower Monumental permits
outfalls	low	Check outfall accuracy
plans	medium	Talk with Susan;
temperature	high	Talk with Susan - propose options: temp difference of current temperatures in outfalls with cap for lethality temperatures (28C); do CORMIX model for near-field effects; write explanation in FS; no mixing zones in WA WQS
clarification	low	Add info to schedule of submittals as indicated in Ellie's emails and if there are additional requirements in PCBs
monitoring	low	
PCBs	medium	See link provided by Ellie in 11/19/18 email. Also in tech support docs: EPA's Plan for Addressing PCBs in the Spokane River

Follow-up	Completed in permit?	Completed in fact sheet?
completed in The Dalles permit	Written in The Dalles NPDES permit	

Corps provided files on EAL and Oil Accountability program write-ups

Ecology	Tables 1/2/3: How is flow to be measured once per month at these outfalls assuming these are continuous discharges? Ecology recommends continuous flow recording to assist in limit development in the next permit and to verify discharge volumes listed in the fact sheet for all cooling water and other continuous discharges. If outfalls associated with drainage sumps do not have continuous discharges and are based on the frequency of emptying a sump via pumping, then clarify that the flow rate should be recorded during every discharge event.
Ecology	Tables 1/2/3: Frequency of pH and oil & grease reporting should be more frequent for the continuous discharge. At least through the first few years of the permit. If monitoring shows consistent results, the permittee may request a reduction in monitoring. Also, how does EPA expect to assess compliance of the O&G daily maximum with only one grab sample per month?
Ecology	**Temperature monitoring listed in Tables 1 and 2 needs clarification.**
Ecology	Please correct the 7-DADM definition as it is the average of seven consecutive measures of daily maximum temperature. The 7-DADM for any individual day is calculated by averaging that day's daily maximum temperature with the daily maximum temperatures of the three days prior and the three days after that date.
Ecology	Ecology suggests including the other temperature reporting requirements (see I.B.10.a) in Tables 1 and 2 for clarity. Also, we recommend revising the monitoring data to include: maximum daily temperature, monthly average, and the 7-DADM. It currently requires a monthly instantaneous maximum and a maximum daily average in addition to the 7-DADM. In addition, the 2003 Ecology document referenced in this section for continuous temperature sampling sets a half-hour recording interval rather than a one-hour interval. Please consider correcting the device recording frequency.
Ecology	The permit contains no requirements for upstream and/or downstream temperature monitoring. How will limits be assessed in the next permit cycle without the receiving water data (which appears to be lacking based on information contained in the fact sheet)?
Ecology	Outfalls 20 and 21 seem to have been left out of the narrative requirements for temperature monitoring – monitoring is only listed in Table 2.
Ecology	For temperature samples that occur once per month in the effluent, please specify that these need to be taken at the same time every day for purposes of a direct comparison.
Ecology	Monitoring tables do not include any monitoring specific to BMP effectiveness evaluations.
Ecology	**Special Conditions:**

monitoring	medium	Ask Susan; think about Corps comments.
monitoring	low	Ask Susan; I'm okay with this
clarification	low	Clarify in permits
temperature	low	Ask Susan; Clarify in permits
temperature	low	Ask Susan; think about this.
outfalls	low	Check permits
monitoring	low	Clarify in permits
plans	medium	Clarify in permits

Ecology	*QAP* : The requirements for the Quality Assurance Plan do not indicate that the QAP is subject to EPA review and approval. As a permit submittal that forms the basis of the self-reporting requirements, Ecology believes that the document (and any subsequent revisions) should be subject to agency approval.
Ecology	*BMP Plan* : The plan must be prepared in accordance with good engineering practices; however, there is no requirement for this report to be signed/sealed by a registered professional engineer. Please clarify whether or not EPA intends the BMP Plan to be prepared by a WA State registered professional engineer. Otherwise, qualify what is meant by good engineering practices.
Ecology	*BMP Plan* : Ecology does not support delay of preparation and compliance of the BMP plan with approval from the Director in writing. If this were to occur, per 40 CFR 122.62, a permit modification complete with a public notice is required to delay the submittal. See public notice requirements in Part 124 or EPA Permit Writers Manual, Chapter 11, Section 11.4.2
Ecology	*BMP Plan:* This section does not include a specific provision for EPA review and approval. As a permit submittal the initial report and any annual updates should be reviewed (and approved) to ensure completeness and accuracy. Please revise B.3.c to include specific language about submission requirements and subsequent approval by the Director or an authorized representative.
Ecology	*BMP Plan:* Use of a BMP infers that there is reasonable potential to violate a water quality standard. Plan requirements involve amendments when there are changes in design, etc. at the facility. How will the facility know that the implemented BMPs are correctly functioning as installed without effectiveness monitoring? This is especially the case regarding release of any PCB containing fluids. Also, as written the plan does not include a quantifiable source reduction requirement. Appendix B requires a summary of existing discharge data; however, the sampling requirements listed in Section I of the draft permit do not substantiate the adaptive management process that makes a BMP process successful. Note: effectiveness monitoring does not need to use 40 CFR 136 methods. For some parameters, these methods are not sensitive enough to form the basis of an adaptive management/BMP approach.
Ecology	*BMP Plan:* The Annual Report submission requirement does not clearly explain the analysis expected. Please revise to ensure the permittee knows that this annual report needs to evaluate the effectiveness of all BMPs implemented onsite, what was effective, what was not effective (and needed changing) and the adaptive management that occurred as a result.
Ecology	*BMP Plan:* Please indicate if BMP incident written reports to EPA and Ecology are required within 7 business or calendar days.

plans	low	Ask Susan
plans	low	Ask Susan
plans	low	Ask Susan
plans	low	Ask Susan
plans	medium	Ask Susan; additional effectiveness monitoring
plans	medium	
plans	low	

Ecology	*EAL:* The requirements for the environmentally acceptable lubricants do not indicate that the document subject to EPA review and approval. As a permit submittal that forms the basis of the self-reporting requirements, Ecology believes that the document (and any subsequent revisions) should be subject to agency approval.
Ecology	*CWIS:* Both the fact sheet and the permit do not contain any design information related to each CWIS at this facility. Consider a requirement to identify existing construction of each CWIS to ensure that it is possible to comply with the system of technologies detailed in the Fish Passage Plans.
Ecology	*CWIS:* All documents prepared by the permittee and submitted to EPA under this section should undergo formal review and approval.
Ecology	o CWIS: The permit contains no specific requirement (other than in II.D.6) for an operations and maintenance manual. Please include a requirement for submitting an approvable O&M Manual for all CWI structures at the facility. Any major changes or updates should also be a required submittal. Contents of the manual should include the procedures for evaluating and reporting impingement and entrainment for each CWIS.
Ecology	*CWIS:* Include a provision that the permit in no way authorizes take for purposes of a facility's compliance with the Endangered Species Act.
Ecology	*CWIS:* The EPA should specify that the 316(b) Annual Report is subject to review and approval.
Ecology	*CWIS:* Consider adding a provision for an entrainment and/or impingement study requirement in the event the application of EPA's BTA are not effective.
Ecology	*III.G.2:* Indicate if reporting is required within five business days or calendar days. Also, provide the phone number and address for all non-compliance reporting. None is currently listed in this section.
Ecology	*IV.G.2:* Anticipated Bypass – Ecology asks EPA to consider including conditions related to the written notice required when the permittee notifies EPA of an anticipated bypass. These include a description of the bypass and reason it's necessary, analysis of alternatives that would eliminate, reduce, or remove potential impacts, the expected duration, projected date, compliance with NEPA/SEPA, plans to reduce reoccurrence of bypass.
Ecology	Appendix A: consider listing the approved method for each parameter and dual reporting limits, if possible. No TSS monitoring is required in the draft permit; however, the fact sheet does mention that TSS can be a pollutant contained in the discharge. Please review the monitoring/effluent limit tables to ensure they capture all pollutants that have reasonable potential to violate water quality standards.
Ecology	Appendix B: 2.c. Please clarify what is meant by 'PCB free'.

plans	low	
CWIS		
CWIS		
CWIS		
CWIS		
CWIS		
CWIS		
clarification	low	Ask Ecology for this information
clarification	low	Ask Susan
clarification	medium	
PCBs	medium	

Ecology	Appendix B: Spill and leak documentation should also include a requirement to document why the spill occurred, the volume and what was done to remedy the issue. This should be part of the annual report's adaptive management requirements if a spill occurs during the permit term.
Ecology - Fact Sheet comments	The fact sheet contains no descriptive information regarding the size, age, and/or condition of the outfalls at each individual dam. Over all, very little descriptive facility information is provided in the fact sheet.
Ecology	No information is provided detailing the age and configuration of the CWIS – including screen sizes, and other design information. This is helpful to understand whether the EPA's BAT approach is protective and applicable to all dams with CWIS or if modifications will be required.
Ecology	Effluent characterization is extremely limited and several reported parameters fall below DL/QLs for analytical methods. How were these data analyzed? Also, use of winter temperatures to assess thermal impacts from the Dalles Lock and Dam does not allow EPA to assess potential impacts to downstream water quality during the critical season. What is the statistical nature of the temperatures provided in the effluent characterization section? Are they daily maximum or 7-DADM?
Ecology	In general, the fact sheet contains no discussion of upstream receiving water quality for any of the dams. Upstream data is necessary for evaluating compliance with surface water quality standards such as temperature and pH.
Ecology	Receiving water designated uses for WA only references spawning and rearing. Please revise to reflect either char spawning and rearing or salmonid spawning, rearing and migration. This affects the application of different water quality criteria.
Ecology	No background temperature data was reported. Given the development of the Columbia River TMDL, Ecology expects this data to be available and used in a reasonable potential analysis.
Ecology	Section III.D. Ecology agrees with the summary of impairments on the lower Columbia River. However, there are concerns regarding the language used that substantiates the approach taken by the EPA to prohibit the discharge of toxic substances. See comments on individual permits in relation to use of BMPs.

plans	low	
clarification	low	clarify
CWIS	low	no information
clarification	low	
clarification	low	
clarification	low	
temperature	low	not enough info for reasonable potential analysis(?)
PCBs	medium	See other PCB comments.

Ecology	Ecology understands that the Idaho Hydroelectric Facility GP's Biological Evaluation studied potential temperature impacts from cooling water from two facilities. However, this evaluation included evaluating the temperature increase using a percentage of receiving water flow for mixing. Ecology supports the requirement for continuous temperature monitoring to inform the TMDL and the next permit cycle; however, any evaluation of temperature impacts in the Lower Columbia cannot incorporate mixing as state water quality standards preclude a mixing zone for impaired waterbodies. Please also provide discussion regarding how these permits will incorporate temperature TMDL WLAs if approved. See individual permit comments for additional discussion regarding receiving water temperature monitoring.
Ecology	Effluent limits and Monitoring, Section IV, overall, Ecology disagrees with the monitoring frequencies listed in the effluent limit and monitoring tables for all of the dams. A frequency of 1/month for continuous a discharge does not provide adequate information in which to characterize the water quality. In addition, monitoring for flow 1/month is not appropriate. See individual permit comments.
Ecology	pH limits do not include the analysis to look at the 0.2/0.5 s.u. allowable change, based on the designated use. Rather, they only include the water quality based range of 6.5 – 8.5 s.u. See comments provided on the individual permits.
Ecology	Ecology disagrees with EPA regarding the statement that there is no information on whether discharges from hydroelectric projects contain toxic or hazardous pollutants other than oil and grease. We do support the narrative effluent limits for toxics; however, given listings on the Columbia for PCBs, quantitative information should be collected on the discharges as part of the BMP plan. This will assist in preferred product purchasing, identification of sources and driving the adaptive management process.
Ecology	TSS was identified as a pollutant of concern in the fact sheet; however, none of the permits contain monitoring for this parameter. Rather, they only include a visual observation. Monitoring for TSS should be included in the Bonneville Project and Dalles Lock and dam permits, if only to provide a metric for the BMP Plan adaptive management strategy. See individual permit comments.
Ecology	For Temperature, the fact sheet states that EPA is proposing continuous influent monitoring on cooling water main units and large transformer units with continuous effluent monitoring. However, the three permits with cooling water discharges only require continuous effluent temperature monitoring. Permits contain no provision for influent monitoring.
Ecology	Minimum levels: please revise to indicate that all samples for effluent limit compliance must use EPA approved analytical methods in addition to meeting the sufficiently sufficient methods requirement. Please also include a statement that characterization or effectiveness monitoring (e.g., for PCBs as part of the BMP plan) may use non Part 136 methods.

temperature	high	
monitoring	low	
pH	medium	
PCBs	medium	
TSS	medium	Ask Susan
monitoring	medium	
clarification	low	

Ecology	Section IV, D: This section details the CWIS requirements for the 3 dams on the Lower Columbia with cooling water intakes. In this section, third paragraph, it indicates that *"the cooling water intake is not the gravity intake where water from the river is taken in for hydroelectric purposes."* This section goes on to explain the BiOps issued by NOAA to minimize and address adverse effects to T&E salmon. What is unclear is if the BiOp, through its application of reasonable and prudent actions, apply to the cooling water intake structures in addition to the dam's hydropower generation operations. Table 17 provides actions for purposes of preserving fish passage to increase survivability; however, nowhere in that table does it describe configuration of CWIS in order to reduce impingement/entrainment. Rather, it seems to only address the flow through the dam specifically for power generating purposes.
Ecology	Section VIII, B & Table 20 – please complete this section and table.
Ecology	Section VIII, D; please provide information related to the original NEPA determination and the date that it was approved for each of the dams.

CWIS	low
??	?
NEPA	?